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January 26, 2022

By ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. John Doe #2, 16 Cr. 588 (PAC)*

Your Honor:

I write with the government's consent respectfully to request an extension – until March 2 – to file the reply memorandum of law in further support of JD-2's 2255 motion. The reason for the request is to allow time to complete a translation of the exhibit at the center of the motion. The government's opposition brief again raised a dispute about the translation making it critical that the defense complete this translation to complete the record. I have conferred with the Spanish translator who is working on this matter and he informs me that, due to other obligations, he may not be able to finish the translation before the end of February. I have not been able to locate a Spanish translator who is less busy. I conferred with AUSA Elinor Tarlow and the government consents to an extension.

I therefore respectfully request that JD-2's time to file a reply be extended until March 2. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman
Attorney for John Doe #2

cc: Counsel of record (by ECF)

1/27/2022

The requested extension to March 2, 2022 is granted. SO ORDERED.

Paul A. Crotty